

FILED

FEB 07 2024

CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
TOLEDO

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL SCHERER,

Defendant.

) INDICTMENT

3:24 CR 34

JUDGE KNEPP

) CASE NO. MAG. JUDGE CLAY

) Title 18, United States Code,
) Section 2252(a)(2)

COUNT 1

(Receipt and Distribution of Child Pornography, 18 U.S.C. § 2252(a)(2))

The Grand Jury charges:

1. From on or about January 1, 2018 to on or about July 29, 2021, in the Northern District of Ohio, Western Division, and elsewhere, Defendant MICHAEL SCHERER did knowingly receive and distribute any visual depiction using any means or facility of interstate commerce, the production of the visual depiction involved the use of a minor engaged in sexually explicit conduct, and such visual depiction was of such conduct, in violation of Title 18, United States Code, Section 2252(a)(2).

FORFEITURE SPECIFICATION

The Grand Jury further charges:

2. For the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 2253, the allegation of Count 1 is hereby re-alleged and incorporated herein by reference. As a result of the foregoing offense, Defendant MICHAEL SCHERER shall forfeit to the United States: (i) all visual depictions described in Title 18, United States Code, Section 2252, and all books, magazines, periodicals, films, videotapes, and other matter which contain

ORIGINAL

any such visual depictions, which were produced, transported, mailed, shipped or received in violation of Title 18, United States Code, Chapter 110; (ii) all property, real and personal, constituting or traceable to gross profits or other proceeds obtained from the offense charged in Count 1; and (iii) all property, real and personal, used or intended to be used to commit or to promote the commission of the offense charged in Count 1 and all property traceable to such property; including, but not limited to, the following:

- a) One iPhone cell phone, seized on January 6, 2023.
- b) Eight (8) Hard drives
- c) One (1) 32 gb SD Memory card
- d) 18 USB Drives
- e) 593 - Floppy disks
- f) 114 - CD/DVD's
- g) 115 - Mini VHS tapes
- h) Pace Modem 503INU
- i) Floppy Drive with floppy
- j) Dell CPU S/N GXZYKH1
- k) Two (2) - External Hard Drives
- l) USB Drive labeled "High Sierra", Sandisk Red
- m) One (1) red 16 gb thumb drive
- n) Memorex 4 gb USB drive
- o) 163 VHS tapes
- p) Samsung Phone
- q) Canon SX620H8 with SD card 16gb
- r) Apple Desktop Computer
- s) Apple Monitor
- t) Five (5) External Hard drives, labeled "A", "B", "C", "D" & "E"
- u) WD Portable Hard drive S/N WXL2A11DA977"
- v) Samsung J7 S/N R58M73MM3EL"
- w) Canon Powershot G3 S/n 6321518125"

A TRUE BILL.

Original document—Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.